

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LANA SUE HANSON, RICHARD A.
HANSON, JANE WILJAMAA, ALAN
WILJAMAA, JAMES ENGLAND,
DEBRA M. ENGLAND, GERALD B.
MANNINEN, RITA P. MANNINEN,
MICHAEL MURPHY, PAMELA S.
MURPHY, PHYLLIS SODERBERG,
ROBERT SODERBERG, KENNETH
STUHR, CONSUELO STUHR, GENE M.
BARTSCH, and PHYLLIS BARTSCH, on
their own behalves and on behalf of a class
of similarly situated participants and
beneficiaries, and,

Plaintiffs,

vs.

GENERAL DYNAMICS
CORPORATION and ALIGHT
SOLUTIONS LLC f/k/a HEWITT
ASSOCIATES LLC),

Defendants.

Case No. 21-cv-00988-PAM-ECW
Case No. 21-cv-01122-PAM-ECW

JOINT STATUS REPORT

Pursuant to the Court's February 28, 2022 Order (Dkt. 52 in Case No. 21-cv-00988 ("*Bartsch*"); Dkt. 48 in Case No. 21-cv-01122 ("*Hanson*")), the parties in the above-captioned actions filed status reports on March 7, 2022, and March 30, 2022 (Bartsch Dkts. 53 and 54; Hanson Dkts. 49 and 50). The parties in the above-captioned actions now respectfully submit this additional Joint Status Report, stating as follows:

1. Plaintiffs Lana Sue Hanson, Richard A. Hanson, Jane Wiljamaa, Alan Wiljamaa, James England, Debra M. England, Gerald B. Manninen, Rita P. Manninen,

Michael Murphy, Pamela S. Murphy, Phyllis Soderberg, Robert Soderberg, Kenneth Stuhr, Consuelo Stuhr, Gene M. Bartsch, and Phyllis Bartsch (“Plaintiffs”) initiated these actions against Defendants General Dynamics Corporation and Alight Solutions LLC f/k/a HewittAssociates LLC (“Defendants”) in April 2021. (*Bartsch* Dkt. 1; *Hanson* Dkt. 1.) Plaintiffs filed amended complaints on October 1, 2021. (*Bartsch* Dkt. 37; *Hanson* Dkt. 34.)

2. On October 22, 2021, Plaintiffs and Defendants filed a Joint Motion to Stay Proceedings while the Parties Mediate (*Bartsch* Dkt. 43; *Hanson* Dkt. 39). The parties selected Robert A. Meyer of JAMS, a well-respected mediator with experience mediating ERISA matters, and agreed to notify the Court via a joint status report as soon as a mediation date was scheduled.

3. On January 4, 2022, the parties participated in a full-day mediation with Mr. Meyer.

4. On January 11, 2022, the parties submitted a status report one week after the mediation regarding the outcome of the mediation and requested an additional three weeks to engage in settlement negotiations through Mr. Meyer. (*Bartsch* Dkt. 47; *Hanson* Dkt. 43.)

5. On February 11, 2022, the Court granted the parties’ Stay Order and ordered them to file a status report as to the mediation by February 18, 2022. (*Bartsch* Dkt. 49; *Hanson* Dkt. 45.)

6. On February 18, 2022, the parties filed a joint status report, stating they had made some progress towards resolving their dispute, but that they planned to proceed either with briefing on Defendants’ anticipated motion to dismiss Plaintiffs’ amended complaint,

or with Plaintiffs seeking leave of the Court to file a second amended complaint, while the parties continued settlement negotiations. (*Bartsch* Dkt. 50; *Hanson* Dkt. 46.)

7. On February 25, 2022, the parties requested another week to continue settlement negotiations before submitting a proposed briefing schedule to the court. (*Bartsch* Dkt. 51; *Hanson* Dkt. 47.)

8. On February 28, 2022, the Court granted the parties' February 25, 2022 request, and ordered the parties to file a briefing schedule on or before March 7, 2022. (*Bartsch* Dkt. 52; *Hanson* Dkt. 48.)

9. On March 7, 2022, the parties submitted a briefing schedule which stated, among other things, that on or before March 31, 2022, Plaintiffs would share with Defendants their proposed second amended complaint. (*Bartsch* Dkt. 53; *Hanson* Dkt. 49.)

10. On March 30, 2022, the parties submitted another joint status report, stating that they had reached an agreement in principle to fully settle these cases, and requested until April 13, 2022, to finalize their settlement of these matters. (*Bartsch* Dkt. 54; *Hanson* Dkt. 50.)

11. On March 31, 2022, the Court granted the parties until April 13, 2022, to finalize settlement of these matters (*Bartsch* Dkt. 55; *Hanson* Dkt. 51.)

12. Since that time, the parties have exchanged settlement agreement drafts and have continued to diligently work to finalize any open issues. While the parties still have a few open items, they respectfully submit that they should be able to finalize the settlement

by April 27, 2022.

Dated: April 12, 2022

Respectfully submitted,

By /Joseph J. Torres

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Dated: April 12, 2022

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